

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

UNITED STATES OF AMERICA,  
*ex rel.* ALEX DOE, Relator

THE STATE OF TEXAS,  
*ex rel.* ALEX DOE, Relator

THE STATE OF LOUISIANA,  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD FEDERATION  
OF AMERICA, INC.,  
PLANNED PARENTHOOD GULF COAST,  
INC.,  
PLANNED PARENTHOOD OF GREATER  
TEXAS, INC.,  
PLANNED PARENTHOOD SOUTH TEXAS,  
INC.,  
PLANNED PARENTHOOD CAMERON  
COUNTY, INC.,  
PLANNED PARENTHOOD SAN ANTONIO,  
INC.,

Defendants.

No. 2:21-cv-022-Z

Date: December 21, 2022

**APPENDIX C IN SUPPORT OF PLANNED PARENTHOOD FEDERATION OF  
AMERICA, INC.'S MEMORANDUM OF LAW IN SUPPORT OF ITS OPPOSITION  
TO TEXAS'S MOTION TO COMPEL**

# APPENDIX C

Priv Log #	Date	Author	Recipient(s)	Privilege Type	Privilege Description
PRIV-002279	6/24/2020	Sandman, Jennifer*	Linton, Melanie; Lambrecht, Ken; Hons, Jeffrey; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Wiens- Talbert, Angie; McKinney, Sheila; Posada, Mara; Sharmeen, Aly; Khan, Alyah; Clark, Christine*; Bajramovic, Hana*; Watkins, Tom*; Muniz, Richard*; Flaxman, Carrie*	Attorney Client Privilege; Work Product; Common Interest	Confidential email requesting and providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002280	1/4/2021	Sandman, Jennifer*	Hons, Jeffrey; Lambrecht, Ken; McKinney, Sheila; Wiens-Talbert, Angie; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Linton, Melanie; Gottlieb, Kathryn*; Krasnoff, Helene*; Flaxman, Carrie*; Ledoux, Abigail; Khan, Alyah; Bajramovic, Hana*	Attorney Client Privilege; Work Product; Common Interest	Confidential email containing legal advice from the in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002291	5/7/2018	Hart, Kelly	Gottlieb, Kathryn*; White, Kasia; Limon-Mercado, Dyana; Gutierrez, Yvonne; Wiens-Talbert, Angie; Posada, Mara; Flaxman, Carrie*; Flood, Kristin*; Watson, Beth; Nguyen, Tram	Attorney Client Privilege	Confidential email providing legal advice from in-house counsel Kathryn Gottlieb, Esq., Carrie Flaxman, Esq., and Kristin Flood, Esq., regarding state regulatory compliance strategy.
PRIV-002296	10/19/2015	Gutierrez, Yvonne	Wheat, Sarah; Hart, Kelly; Wiens-Talbert, Angie; Tafolla, Rochelle; Estibaliz, Mara; Limon-Mercado, Dyana; Diaz, Alejandra; Wells, Danielle; Krasnoff, Helene*; Flaxman, Carrie*	Attorney Client Privilege	Confidential email providing legal advice from PPFA Legal Department regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002309	1/6/2021	Wheat, Sarah	Sandman, Jennifer*; Khan, Alyah; Ledoux, Abigail; Posada, Mara; Limon- Mercado, Dyana; Hart, Kelly; Rochelle, Tafolla; Wiens-Talbert, Angie; Gottlieb, Kathryn*; McKinney, Sheila; Barraza, Polin*; Curtis, Alfred; Krasnoff, Helene*	Attorney Client Privilege; Work Product	Confidential email discussing legal advice from in-house counsel Helene Krasnoff, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002310	1/5/2021	Sandman, Jennifer*	Khan, Alyah; Ledoux, Abigail; Posada, Mara; Wheat, Sarah; Limon-Mercado, Dyana; Hart, Kelly; Rochelle, Tafolla; Wiens-Talbert, Angie; Gottlieb, Kathryn*; McKinney, Sheila; Barraza, Polin*; Curtis, Alfred; Krasnoff, Helene*	Attorney Client Privilege; Work Product	Confidential email containing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002311	6/24/2020	Sandman, Jennifer*	Linton, Melanie; Lambrecht, Ken; Hons, Jeffrey; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Wiens- Talbert, Angie; McKinney, Sheila; Posada, Mara; Sharmeen, Aly; Khan, Alyah; Clark, Christine*; Bajramovic, Hana*; Watkins, Tom*; Muniz, Richard*; Flaxman, Carrie*	Attorney Client Privilege; Work Product	Confidential email containing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002312	6/24/2020	Sandman, Jennifer*	Linton, Melanie; Lambrecht, Ken; Hons, Jeffrey; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Wiens- Talbert, Angie; McKinney, Sheila; Posada, Mara; Sharmeen, Aly; Khan, Alyah; Clark, Christine*; Bajramovic, Hana*; Watkins, Tom*; Muniz, Richard*; Flaxman, Carrie*	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002313	6/24/2020	Sandman, Jennifer*	Linton, Melanie; Lambrecht, Ken; Hons, Jeffrey; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Wiens- Talbert, Angie; McKinney, Sheila; Posada, Mara; Sharmeen, Aly; Khan, Alyah; Clark, Christine*; Bajramovic, Hana*; Watkins, Tom*; Muniz, Richard*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002314	6/24/2020	Sandman, Jennifer*	Linton, Melanie; Lambrecht, Ken; Hons, Jeffrey; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Wiens- Talbert, Angie; McKinney, Sheila; Posada, Mara; Sharmeen, Aly; Khan, Alyah; Clark, Christine*; Bajramovic, Hana*; Watkins, Tom*; Muniz, Richard*	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002315	4/21/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada; Limon- Mercado, Dyana; Wiens- Talbert, Angie; Wheat, Sarah; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002316	12/16/2020	Sandman, Jennifer*	Wheat, Sarah; Weins-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melanie; Gottlieb, Kathryn*; Barraza, Polin; McKinney, Sheila; Khan, Alyah; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Keiser, Autumn; Posada, Mara; Ledoux, Abigail; Bajramovic, Hana*; Bajwa, Ayeza	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002317	12/16/2020	Sandman, Jennifer*	Khan, Alyah; Benazar Acosta, Gabriela; Limon- Mercado, Dyana; Ledoux, Abigail; Soto, Alejandra; Gottlieb, Kathryn*; Hart, Kelly; Johnson, Anjel; Keiser, Autumn; Posada, Mara; Tafolla, Rochelle; Wheat, Sarah	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002318	12/14/2020	Sandman, Jennifer*	Wheat, Sarah; Weins-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melanie; Gottlieb, Kathryn*; Barraza, Polin; McKinney, Sheila; Khan, Alyah; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Keiser, Autumn; Posada, Mara; Ledoux, Abigail; Bajramovic, Hana*; Bajwa, Ayeza	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002319	12/14/2020	Sandman, Jennifer*	Weins-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melanie; McKinney, Sheila; Barraza, Polin*; Gottlieb, Kathryn*; Wheat, Sarah; Khan, Alyah; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Posada, Mara; Keiser, Autumn; Ledoux, Abigail; Bajramovic, Hana*; Bajwa, Ayeza	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002320	12/14/2020	Sandman, Jennifer*	Wiens-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melanie; McKinney, Sheila; Barraza, Polin*; Gottlieb, Kathryn*; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Posada, Mara; Keiser, Autumn; Ledoux, Abigail; Bajramovic, Hana*; Bajwa, Ayeza	Attorney Client Privilege	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002321	12/14/2020	Gottlieb, Kathryn*	Wheat, Sarah; Sandman, Jennifer*; Wiens-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melanie; McKinney, Sheila; Barraza, Polin*; Khan, Alyah; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Posada, Mara; Keiser, Autumn; Ledoux, Abigail; Bajramovic, Hana*; Bajwa, Ayeza	Attorney Client Privilege	Confidential email containing legal advice from in-house counsel Jennifer Sandman, Esq. regarding media relations.
PRIV-002322	12/14/2020	Wheat, Sarah	Sandman, Jennifer*; Wiens-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melanie; McKinney, Sheila; Barraza, Polin*; Gottlieb, Kathryn*; Khan, Alyah; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Posada, Mara; Keiser, Autumn; Ledoux, Abigail; Bajramovic, Hana*; Bajwa, Ayeza	Attorney Client Privilege	Confidential email containing legal advice from in-house counsel Jennifer Sandman, Esq. regarding media relations.
PRIV-002323	12/14/2020	Sandman, Jennifer*	Wiens-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melanie; McKinney, Sheila; Barraza, Polin*; Gottlieb, Kathryn*; Wheat, Sarah; Khan, Alyah; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Posada, Mara; Keiser, Autumn; Ledoux, Abigail; Bajramovic, Hana*; Bajwa, Ayeza	Attorney Client Privilege	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding media relations.
PRIV-002324	4/7/2020	Sandman, Jennifer*	Linton, Melanie; Lambrecht, Ken; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding media relations.
PRIV-002325	4/7/2020	Sandman, Jennifer*	Linton, Melanie; Lambrecht, Ken; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002326	4/3/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002327	3/31/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002328	3/31/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002329	3/31/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of
PRIV-002330	3/30/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq., regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002331	3/30/2020	McKinney, Sheila	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002332	3/30/2020	Wheat, Sarah	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002333	3/29/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email discussing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002334	3/26/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email discussing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002335	3/26/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002336	3/26/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002337	3/26/2020	Gottlieb, Kathryn*	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon- Mercado, Dyana; Wiens- Talbert, Angie; Clapman, Alice*; Muniz, Richard*; Murray, Julie*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002338	3/26/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002339	12/11/2020	Hons, Jeffrey	Sandman, Jennifer*; Khan, Alyah; Wheat, Sarah; Hart, Kelly; Limon-Mercado, Dyana; Tafolla, Rochelle; Gottlieb, Kathryn*; Wiens- Talbert, Angie; Johnson, Anjel; Posada, Mara; Posada, Ledoux, Abigail; Keiser, Autumn; McKinney, Sheila; Lambrecht, Ken; Linton, Melaney	Attorney Client Privilege	Confidential email providing legal advice from Kathryn Gottlieb, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002340	4/21/2020	Gottlieb, Kathryn*	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada, Mara; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002344	12/15/2020	Sandman, Jennifer*	Wheat, Sarah; Wiens-Talbert, Angie; Hons, Jeffrey; Lambrecht, Ken; Linton, Melaney; Gottlieb, Kathryn*; Barraza, Polin*; McKinney, Sheila; Khan, Alyah; Curtis, Alfred; Hart, Kelly; Johnson, Anjel; Limon-Mercado, Dyana; Tafolla, Rochelle; Keiser, Autumn; Posada, Mara; Ledoux, Abigail; Bajramovic, Hana*; Ayeza Bajwa	Attorney Client Privilege; Work Product	Confidential email requesting legal advice from outside counsel Alan E Schoenfeld, Esq., Stephanie Simon, Esq., and Paul Wolfson, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002356	6/24/2020	Lambrecht, Ken	Sandman, Jennifer*; Linton, Melaney; Hons, Jeffrey; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Wiens-Talbert, Angie; McKinney, Sheila; Posada, Mara; Aly, Sharmeen; Khan, Alyah; Clarke, Christine*; Bajramovic, Hana*; Watkins, Tom*; Muniz, Richard*	Attorney Client Privilege; Work Product	Confidential draft document attached to email and sent for the purpose of obtaining legal advice from outside counsel Alan E. Schoenfeld, Esq., Paul Wolfson, Esq., and Stephanie Simon, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002361	11/23/2020	Sandman, Jennifer*	Linton, Melaney; Hons, Jeffrey; Lambrecht, Ken; Gottlieb, Kathryn*; Wiens-Talbert, Angie; Wheat, Sarah; Limon-Mercado, Dyana; McKinney, Sheila; Barraza, Polin*; Posada, Mara	Attorney Client Privilege; Work Product	Redacted confidential email requesting and providing legal advice from in- house counsel Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002362	4/7/2020	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*	Attorney Client Privilege; Work Product	Confidential draft document attached to email and containing legal advice from in-house counsel Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002363	4/7/2020	Hons, Jeffrey	Sandman, Jennifer*; Linton, Melaney; Lambrecht, Ken; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002364	4/3/2020	Hons, Jeffrey	Sandman, Jennifer*; Linton, Melaney; Lambrecht, Ken; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002369	3/26/2020	Barraza, Polin	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email requesting and providing legal advice from in-house counsel Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002370	5/16/2019	Sandman, Jennifer*	Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Wiens-Talbert, Angie; McKinney, Sheila; Posada, Mara; Aly, Sharmeen; Khan, Alyah; Clarke, Christine*; Bajramovic, Hana*; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential draft document attached to email and sent for the purpose of obtaining legal advice from in-house counsel Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002373	4/20/2020	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu; Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002374	4/20/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada, Mara; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Wheat, Sarah; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential draft document attached to email and containing legal advice from in-house counsel Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.



PRIV-002375	4/17/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada, Mara; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Wheat, Sarah; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002381	1/21/2021	Sandman, Jennifer*	Wheat, Sarah; Gottlieb, Kathryn*; Hons, Jeffrey; Lambrecht, Ken; Linton, Melanie; Barraza, Polin*; McKinney, Sheila; Curtis, Alfred; Limon-Mercado, Dyana; Posada, Mara; Khan, Alyah; Hart, Kelly; Johnson, Anjel; Ledoux, Abigail; Wiens-Talbert, Angie; Tafolla, Rochelle; Bajramovic, Hana*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq., Hana Bajramovic, Esq., Hannah Swanson, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002386	12/11/2020	Sandman, Jennifer*	Khan, Alyah; Wheat, Sarah; Hart, Kelly; Limon-Mercado, Dyana; Tafolla, Rochelle; Gottlieb, Kathryn*; Wiens-Talbert, Angie; Johnson, Anjel; Posada, Mara; Ledoux, Abigail; Keiser, Autumn; McKinney, Sheila; Lambrecht, Ken; Hons, Jeffrey; Linton, Melanie	Attorney Client Privilege	Confidential email requesting legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002387	12/11/2020	Sandman, Jennifer*	Khan, Alyah; Wheat, Sarah; Hart, Kelly; Limon-Mercado, Dyana; Everett, Andrew; Tafolla, Rochelle; Gottlieb, Kathryn*; Wiens-Talbert, Angie; Johnson, Anjel; Posada, Mara; Ledoux, Abigail; Keiser, Autumn; McKinney, Sheila; Lambrecht, Ken; Hons, Jeffrey; Linton, Melanie	Attorney Client Privilege	Confidential email containing legal advice from in-house counsel Julie Murray, Esq. regarding affiliate communication strategy.
PRIV-002388	1/4/2021	Sandman, Jennifer*	Hons, Jeffrey; Lambrecht, Ken; McKinney, Sheila; Wiens-Talbert, Angie; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Linton, Melanie; Gottlieb, Kathryn*; Krasnoff, Helene*; Flaxman, Carrie*; Ledoux, Abigail; Khan, Alyah; Bajramovic, Hana	Attorney Client Privilege	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding Medicaid.
PRIV-002389	12/23/2020	Sandman, Jennifer*	Posada, Mara; Limon-Mercado, Dyana; Gottlieb, Kathryn*; Hart, Kelly; Keiser, Autumn; Johnson, Anjel; Tafolla, Rochelle; Wheat, Sarah; Wiens-Talbert, Angie; Khan, Alyah; Ledoux, Abigail; Linton, Melanie; Hons, Jeffrey; Lambrecht, Ken	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding Medicaid.
PRIV-002390	12/4/2020	Murray, Julie*	Gottlieb, Kathryn*; Lambrecht, Ken; Linton, Melanie; Jeffrey Hons; Polin Barraza; McKinney, Sheila; Mara Posada; Dyana Limon-Mercado; Wiens-Talbert, Angie; Wheat, Sarah; Swanson, Hannah*; Angela Wu; Jennifer Sandman*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding Medicaid compliance.

PRIV-002392	3/31/2020	Hons, Jeffrey	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine	Attorney Client Privilege; Work Product	Confidential email requesting and providing legal advice from in-house counsel Julie Murray, Esq., Hannah Swanson, Esq., Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002394	3/30/2020	Jeffrey Hons	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Wheat, Sarah; Polin Barraza; Mara Posada; McKinney, Sheila; Dyana Limon-Mercado; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julia*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email requesting legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002395	3/30/2020	Linton, Melaney	Sandman, Jennifer*; Lambrecht, Ken; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Dyana Limon-Mercado; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email attached to email and sent for the purpose of obtaining legal advice from in-house counsel Jennifer Sandman, Esq., Bethany Sousa, Esq., and Kristin Flood, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002396	3/30/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Polin Barraza; Posada, Mara; McKinney, Sheila; Dyana Limon-Mercado; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email requesting legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002400	2/15/2019	Sandman, Jennifer*	Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Gutierrez, Yvonne; Wiens-Talbert, Angie; McKinney, Sheila; Posada, Mara; Clark, Christine*; Bajramovic, Hana*; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential document attached to email and sent for the purpose of obtaining legal advice from in-house counsel Julie Murray, Esq., Jennifer Sandman, Esq., and Richard Muniz, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002401	12/19/2019	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Wiens-Talbert, Angie; McKinney, Sheila; Posada, Mara; Sharmeen, Aly; Khan, Alyah; Clarke, Christine*; Bajramovic, Hana*; Watkins, Tom*; Muniz, Richard*	Attorney Client Privilege; Work Product	Confidential document attached to email and sent for the purpose of obtaining legal advice from in-house counsel Julie Murray, Esq., Jennifer Sandman, Esq., and Richard Muniz, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002402	1/25/2019	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Palmer, Jeffrey; McKinney, Sheila; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Limon-Mercado, Dyana; Gutierrez, Yvonne; Tafolla, Rochelle; Posada, Mara; Wiens-Talbert, Angie; Keiser, Autumn; Gottlieb, Kathryn*; Watkins, Tom*; Bajramovic, Hana*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding Medicaid and prepared in anticipation of litigation.
PRIV-002403	1/18/2019	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Palmer, Jeffrey; McKinney, Sheila; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Limon-Mercado, Dyana; Gutierrez, Yvonne; Tafolla, Rochelle; Posada, Mara; Wiens-Talbert, Angie; Keiser, Autumn; Gottlieb, Kathryn*; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002404	2/15/2019	Linton, Melaney	Sandman, Jennifer*; Lambrecht, Ken; Hons, Jeffrey; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Gutierrez, Yvonne; Wiens-Talbert, Angie; McKinney, Sheila; Posada, Mara; Clarke, Christine*; Bajramovic, Hana*; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002405	2/15/2019	Hons, Jeffrey	Linton, Melaney; Sandman, Jennifer*; Lambrecht, Ken; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Gutierrez, Yvonne; Wiens-Talbert, Angie; McKinney, Sheila; Posada, Mara; Clarke, Christine*; Bajramovic, Hana*; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002406	5/29/2018	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Palmer, Jeffrey; McKinney, Sheila; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Limon-Mercado, Dyana; Gutierrez, Yvonne; Belasco, Jessica; Tafolla, Rochelle; Posada, Mara; Wiens-Talbert, Angie; Keiser, Autumn; Gottlieb, Kathryn*; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential email discussing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002407	5/24/2018	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Palmer, Jeffrey; McKinney, Sheila; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Limon-Mercado, Dyana; Gutierrez, Yvonne; Belasco, Jessica; Tafolla, Rochelle; Posada, Mara; Wiens-Talbert, Angie; Keiser, Autumn; Gottlieb, Kathryn*; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential email discussing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002408	4/9/2019	Sandman, Jennifer*	Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney; Limon-Mercado, Dyana; Wheat, Sarah; Hart, Kelly; Keiser, Autumn; Gottlieb, Kathryn*; Palmer, Jeffrey; Tafolla, Rochelle; Barraza, Polin*; Gutierrez, Yvonne; Wiens-Talbert, Angie; McKinney, Sheila; Posada, Mara; Clarke, Christine*; Bajramovic, Hana*; Watkins, Tom*	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002410	2/21/2017	Sandman, Jennifer*	Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney; Keiser, Autumn; Palmer, Jeffrey; Wiens-Talbert, Angie; Posada, Mara; Tafolla, Rochelle; Gottlieb, Kathryn*; Belasco, Jessica; Gutierrez, Yvonne; Lynk, Beth; Muniz, Richard*; Watkins, Tom*; Ratakonda, Mai*; Clapman, Alice*; Wells, Danielle; Limon-Mercado, Dyana; Hart, Kelly; Wheat, Sarah	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002411	2/21/2017	Wheat, Sarah	Sandman, Jennifer*; Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney; Keiser, Autumn; Palmer, Jeffrey; Wiens-Talbert, Angie; Posada, Mara; Tafolla, Rochelle; Muniz, Richard*; Watkins, Tom*; Ratakonda, Mai*; Clapman, Alice*; Wells, Danielle; Gottlieb, Kathryn*; Belasco, Jessica; Gutierrez, Yvonne; Limon-Mercado, Dyana; Hart, Kelly; Lynk, Beth	Attorney Client Privilege; Work Product; Common Interest	Confidential document attached to email and containing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002412	2/4/2019	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Limon-Mercado, Dyana; Gottlieb, Kathryn*; Hart, Kelly; Keiser, Autumn; Posada, Mara; McKinney, Sheila; Palmer, Jeffrey; Barraza, Polin*; Tafolla, Rochelle; Wheat, Sarah; Wiens-Talbert, Angie; Gutierrez, Yvonne; Clarke, Christine; Bajramovic, Hana*; Watkins, Tom*	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002413	2/4/2019	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Limon-Mercado, Dyana; Gottlieb, Kathryn*; Hart, Kelly; Keiser, Autumn; Posada; Mara; McKinney, Sheila; Palmer, Jeffrey; Barraza, Polin*; Tafolla, Rochelle; Wheat, Sarah; Wiens-Talbert, Angie; Gutierrez, Yvonne; Clarke, Christine; Bajramovic, Hana*; Watkins, Tom*	Attorney Client Privilege; Work Product; Common Interest	Confidential email requesting legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002414	2/1/2019	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Limon-Mercado, Dyana; Gottlieb, Kathryn*; Hart, Kelly; Keiser, Autumn; Posada, Mara; McKinney, Sheila; Palmer, Jeffrey; Barraza, Polin*; Tafolla, Rochelle; Wheat, Sarah; Wiens-Talbert, Angie; Gutierrez, Yvonne; Clarke, Christine; Bajramovic, Hana*; Watkins, Tom*	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002415	1/31/2019	Sandman, Jennifer*	Limon-Mercado, Dyana; Gottlieb, Kathryn*; Hart, Kelly; Hons, Jeffrey; Keiser, Autumn; Lambrecht, Ken; Linton, Melaney; Posada, Mara; McKinney, Sheila; Palmer, Jeffrey; Barraza, Polin*; Tafolla, Rochelle; Wheat, Sarah; Wiens-Talbert, Angie; Gutierrez, Yvonne; Bajramovic, Hana*; Watkins, Tom*	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002416	1/31/2019	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Palmer, Jeffrey; McKinney, Sheila; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Limon-Mercado, Dyana; Gutierrez, Yvonne; Tafolla, Rochelle; Posada, Mara; Wiens-Talbert, Angie; Keiser, Autumn; Gottlieb, Kathryn*; Watkins, Tom*; Bajramovic, Hana*	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002417	5/31/2018	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Palmer, Jeffrey; McKinney, Sheila; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Limon-Mercado, Dyana; Gutierrez, Yvonne; Belasco, Jessica; Tafolla, Rochelle; Posada, Mara; Wiens-Talbert, Angie; Keiser, Autumn; Gottlieb, Kathryn*; Watkins, Tom*	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002418	1/6/2017	Sandman, Jennifer*	Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney; Keiser, Autumn; Palmer, Jeffrey; Wiens-Talbert, Angie; Posada, Mara; Taffolla, Rochelle; Gottlieb, Kathryn*; Belasco, Jessica; Gutierrez, Yvonne; Limon-Mercado, Dyana; Hart, Kelly; Wheat, Sarah; Lynk, Beth; Muniz, Richard*; Watkins, Tom*; Ratakonda, Mai*	Attorney Client Privilege; Work Product; Common Interest	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002419	12/30/2016	Sandman, Jennifer*	Wheat, Sarah; Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney; Keiser, Autumn; Posada, Mara; Taffolla, Rochelle; Gottlieb, Kathryn*; Wiens-Talbert, Angie; Limon-Mercado, Dyana; Yvonne Gutierrez; Taverite, Andrew; Sackin, Erica; Watkins, Tom*; Ratakonda, Mai*; Muniz, Richard*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002420	2/21/2017	Sandman, Jennifer*	Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney; Keiser, Autumn; Posada, Mara; Taffolla, Rochelle; Gottlieb, Kathryn*; Wiens-Talbert, Angie; Belasco, Jessica; Gutierrez, Yvonne; Limon-Mercado, Dyana; Hart, Kelly; Lynk, Beth; Wheat, Sarah; Watkins, Tom*; Muniz, Richard*; Ratakonda, Mai*; Wells, Danielle; Clapman, Alice*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002421	2/21/2017	Hons, Jeffrey	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Keiser, Autumn; Palmer, Jeffrey; Wiens-Talbert, Angie; Posada, Mara; Taffolla, Rochelle; Gottlieb, Kathryn*; Belasco, Jessica; Gutierrez, Yvonne; Limon-Mercado, Dyana; Hart, Kelly; Wheat, Sarah; Lynk, Beth; Muniz, Richard*; Watkins, Tom*; Ratakonda, Mai*; Clapman, Alice*; Wells, Danielle	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002422	2/21/2017	Gottlieb, Kathryn*	Sandman, Jennifer*; Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney; Keiser, Autumn; Posada, Mara; Taffolla, Rochelle; Gottlieb, Kathryn*; Wiens-Talbert, Angie; Belasco, Jessica; Gutierrez, Yvonne; Limon-Mercado, Dyana; Hart, Kelly; Lynk, Beth; Wheat, Sarah; Palmer, Jeffrey; Watkins, Tom*; Muniz, Richard*; Ratakonda, Mai*; Wells, Danielle; Clapman, Alice*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq., Richard Muniz, Esq., Mai Ratakonda, Esq., and Alice Clapman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002423	2/3/2017	Sandman, Jennifer*	Lambrecht, Ken; Hons, Jeffrey; Linton, Melaney; Keiser, Autumn; Palmer, Jeffrey; Wiens-Talbert, Angie; Posada, Mara; Taffolla, Rochelle; Gottlieb, Kathryn*; Belasco, Jessica; Gutierrez, Yvonne; Limon-Mercado, Dyana; Hart, Kelly; Wheat, Sarah; Lynk, Beth; Muniz, Richard*; Watkins, Tom*; Ratakonda, Mai*	Attorney Client Privilege; Work Product	Confidential email requesting legal advice from in-house counsel Jennifer Sandman, Esq., Richard Muniz, Esq., Mai Ratakonda, Esq., and Alice Clapman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002424	12/27/2016	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Limon-Mercado, Dyana; Keiser, Autumn; Posada, Mara; Tafolla, Rochelle; Wiens-Talbert, Angie; Gutierrez, Yvonne; Gottlieb, Kathryn*; Hart, Kelly; Wheat, Sarah; Wells, Danielle; Lynk, Beth; Watkins, Tom*; Ratakonda, Mai*; Muniz, Richard*	Attorney Client Privilege; Work Product	Confidential email requesting and providing legal advice from in-house counsel Jennifer Sandman, Esq., Richard Muniz, Esq., and Mai Ratakonda, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002425	12/22/2016	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Limon-Mercado, Dyana; Keiser, Autumn; Posada, Mara; Tafolla, Rochelle; Wiens-Talbert, Angie; Yvonne Gutierrez; Gottlieb, Kathryn*; Hart, Kelly; Wheat, Sarah; Wells, Danielle; Lynk, Beth; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential email requesting and providing legal advice from in-house counsel Jennifer Sandman, Esq., Richard Muniz, Esq., and Mai Ratakonda, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002426	12/6/2016	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Limon-Mercado, Dyana; Keiser, Autumn; Posada, Mara; Tafolla, Rochelle; Wiens-Talbert, Angie; Yvonne Gutierrez; Gottlieb, Kathryn*; Hart, Kelly; Wheat, Sarah; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002427	10/26/2016	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Limon-Mercado, Dyana; Keiser, Autumn; Posada, Mara; Tafolla, Rochelle; Wiens-Talbert, Angie; Yvonne Gutierrez; Gottlieb, Kathryn*; Hart, Kelly; Wheat, Sarah; Wells, Danielle; Lynk, Beth; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002428	3/22/2017	Sandman, Jennifer*	Hons, Jeffrey; Lambrecht, Ken; Linton, Melaney; Palmer, Jeffrey; McKinney, Sheila; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Limon-Mercado, Dyana; Gutierrez, Yvonne; Belasco, Jessica; Tafolla, Rochelle; Posada, Mara; Wiens-Talbert, Angie;; Keiser, Autumn; Gottlieb, Kathryn*; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002429	3/17/2017	Hons, Jeffrey	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Palmer, Jeffrey; McKinney, Sheila; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Limon-Mercado, Dyana; Gutierrez, Yvonne; Belasco, Jessica; Tafolla, Rochelle; Posada, Mara; Wiens-Talbert, Angie; Keiser, Autumn; Gottlieb, Kathryn*; Watkins, Tom	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002430	3/16/2017	Sandman, Jennifer*	Hons, Jeffrey; Lambrecht, Ken; Linton, Melaney; Palmer, Jeffrey; McKinney, Sheila; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Limon-Mercado, Dyana; Gutierrez, Yvonne; Belasco, Jessica; Tafolla, Rochelle; Posada, Mara; Wiens-Talbert, Angie; Keiser, Autumn; Gottlieb, Kathryn*; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002431	3/30/2017	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Palmer, Jeffrey; McKinney, Sheila; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Limon-Mercado, Dyana; Gutierrez, Yvonne; Belasco, Jessica; Tafolla, Rochelle; Posada, Mara; Wiens-Talbert, Angie; Keiser, Autumn; Gottlieb, Kathryn*; Lynk, Beth; Watkins, Tom*	Attorney Client Privilege; Work Product; Common Interest	Confidential email requesting legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002432	3/29/2017	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Jeffrey Hons; Palmer, Jeffrey; McKinney, Sheila; Barraza, Polin*; Hart, Kelly; Wheat, Sarah; Limon-Mercado, Dyana; Gutierrez, Yvonne; Belasco, Jessica; Tafolla, Rochelle; Posada, Mara; Wiens-Talbert, Angie; Keiser, Autumn; Gottlieb, Kathryn*; Watkins, Tom*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002433	12/29/2016	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Limon-Mercado, Dyana; Keiser, Autumn; Posada, Mara; Tafolla, Rochelle; Wiens-Talbert, Angie; Gutierrez, Yvonne; Gottlieb, Kathryn*; Hart, Kelly; Wheat, Sarah; Watkins, Tom*; Ratakonda, Mal*; Muniz, Richard*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002434				Attorney Client Privilege; Work Product	Confidential draft document attached to email and containing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation